

PX17

PX17 Attachment S

Correspondence from payment processors obtained from
office of Lindsey Martinez and Seth Davies

I very Pro Intense



September 5, 2014

MID: [REDACTED]

Solid Ice LLC
1910 S. Stapley Drive, Suite 221
Mesa, AZ 85204

Christy Gould

Good afternoon,

US Merchant Systems, in cooperation with our Member Bank, has implemented changes to our portfolio of high risk accounts. The FDA, FTC and other governing agencies have taken civil action against merchants and processors who allow sales of products whereby many of the claims of product effectiveness and expected results have been unsubstantiated, are misleading, or pertinent information has not been fully disclosed to consumers. In an effort to comply with specific restrictions, follow regulatory guidelines, minimize chargeback activity, and avoid undue third party or regulatory intervention, we unfortunately must close your account.

Restricted products now include: Teeth Whitening, "detoxification", "cleansing", "male/female sexual performance enhancement" or products that contain the following ingredients: Acai berry, peptides, Hoodia, Noni juice, HCG (human chorionic gonadotropin) or HGH (human growth hormone), testosterone, and steroids.

The account closure date will be Friday, September 19th, 2014. All batches must be closed by 6:00pm PST. After the 19th, the account will be left "open" for refunds only, for a period of thirty to sixty days, to allow you to process refunds and avoid or minimize charge backs.

We regret that we have to take this action, but in an effort to protect all associated parties from regulatory scrutiny, we have thoroughly reviewed our portfolio and assessed that your account has fallen in this group for mandatory closure. We would like to emphasize that we will continue to accept and process Nutraceutical accounts for Garcinia, Green Coffee, African Mango, workout supplements, prostate support and various other supplements that meet our guidelines for acceptance.

It is still and will continue to be your responsibility to reduce chargebacks by refunding your customers promptly within your refund policy guidelines. Remember that even though your account is closed, refunds and chargebacks are your financial responsibility, and excess charge backs or unpaid charge backs, refunds and fees can cause your business or you, as the principal, to be listed on the Visa/MC/Discover- Combined Terminated Merchant File (CTMF), which can make it very difficult to obtain merchant services in the future. This is why we will allow accounts to remain open in order to process refunds.

We appreciate your understanding and cooperation in this matter.

Thank you,

Risk Management
800-655-8767 ext 2148



Ivory Pro Online

September 2, 2014

MID: [REDACTED]

Solid Ice LLC
2011 Cherry Street, Suite 202
Louisville, CO 80027

Christy Gould

Good afternoon,

US Merchant Systems, in cooperation with our Member Bank, has implemented changes to our portfolio of high risk accounts. The FDA, FTC and other governing agencies have taken civil action against merchants and processors who allow sales of products whereby many of the claims of product effectiveness and expected results have been unsubstantiated, are misleading, or pertinent information has not been fully disclosed to consumers. In an effort to comply with specific restrictions, follow regulatory guidelines, minimize chargeback activity, and avoid undue third party or regulatory intervention, we unfortunately must close your account.

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The account closure date will be Tuesday, September 5th, 2014. All batches must be closed by 6:00pm PST. After the 5th, the account will be left "open" for refunds only, for a period of thirty to sixty days, to allow you to process refunds and avoid or minimize charge backs.

We regret that we have to take this action, but in an effort to protect all associated parties from regulatory scrutiny, we have thoroughly reviewed our portfolio and assessed that your account has fallen in this group for mandatory closure. We would like to emphasize that we will continue to accept and process Nutracutical accounts for Garcinia, Green Coffee, African Mango, workout supplements, prostate support and various other supplements that meet our guidelines for acceptance.

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Risk Management
800-655-8767 ext 2148

*Solid Ice
as of 11/17/14 app.*

Megan Goodman

From: Tony Runestad <tony@gmapay.com>
Sent: Wednesday, July 16, 2014 12:52 PM
To: Megan Goodman
Subject: FW: Solid Ice LLC | AWO*ActionWhiteOnline
Attachments: CB Reduction Template.doc

Hi Megan,

I unfortunately have bad news regarding this account. Here are the notes from Risk & UW:

Merchant has existing account with GMA and other providers. Merchant has high chargeback ratios on both count and amount. In order for us to proceed with this app, merchant must show improvement and lower their ratios to acceptable levels. Account could be resubmitted in 90 days. Attached is a chargeback reduction template that needs to be completed by this merchant for existing MID.

I apologize we couldn't get this one pushed through, but we'll keep working on the other one.

Thank you Megan,

Tony Runestad
National Sales Manager

Tel: 310.220.0624 Ext. 203
Fax: 310.773.9213
Skype: tony.runestad44
11835 W. Olympic Blvd., Suite 650E
Los Angeles, CA 90064
tony@gmapay.com
www.gmapay.com



Global Merchant Advisors is a registered ISO/MSP for BMO Harris Bank, N.A., Chicago, IL.

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From: Kristina Pruitt
Sent: Wednesday, July 16, 2014 7:29 AM
To: Tony Runestad
Cc: Danny Azarov; Tina Makarem
Subject: Solid Ice LLC | AWO*ActionWhiteOnline

Hi Tony,

- Merchant has existing account with GMA and other providers. Merchant has high chargeback ratios on both count and amount. In order for us to proceed with this app, merchant must show improvement and lower their ratios to acceptable levels. Account could be resubmitted in 90 days.

Attached is a chargeback reduction template that needs to be completed by this merchant for existing MID.

Thanks,
Kristina



March 30, 2015

Solid Ice LLC
1910 S Stapley Drive #221
Mesa, AZ 85204

MID: [REDACTED]
DBA: TitanWhite Marketing

Dear Christy Gould:

This letter is to notify you that your merchant account with Meritus Payment Solutions has been terminated for one or more of the reasons listed below:

- ☐ Excessive chargebacks and/or retrievals
- ☐ Excessive authorizations and/or fraudulent transactions
- ☐ The nature of your business poses a security risk
- ☐ Receipt of unsatisfactory data from other sources (credit reporting agencies, MATCH, etc.)
- ☐ Substantial change in your financial condition
- ☐ Collections
- ☐ Misrepresentation of information related to your application or the services/products offered
- ☐ Substantial change in the form, management, operations, or ownership of your business
- ☐ Violation of Card Association Rules

Because of the nature of this termination, all funds, deposits, securities, pledges, and reserves held by or assigned to us or our acquiring bank will remain withheld for a period of at least 180 days after the last chargeback or date of termination, whichever is greater, to prevent any potential losses incurred by us or our acquiring bank. All chargebacks will first be charged to the merchant's bank account. If that bank account does not contain sufficient funds to cover the chargebacks, we may withdraw funds from any of the accounts held by us to cover the chargebacks (as well as any related fees and fines).

We regret having to take this position, but we hope to make this transition as easy as possible. If you have any questions regarding this letter, please contact the Risk Department.

Sincerely,

Meritus Payment Solutions
Attn: Risk Department
2600 Michelson Drive, Suite 1600
Irvine, CA 92612
Phone: (949) 788-1010
Fax: (949) 861-9240
risk@merituspayment.com



Risk Closure Letter

Date: March 26, 2015

Re: [REDACTED]

Dental Pro at Home

SNOW SALE, LLC
ATTN: BRIAN LINT
4845 PEARL E CIR STE 101
BOULDER, CO 80301

Dear Valued Customer,

Please be advised that you are in breach of your Merchant Agreement with Humboldt Merchant Services therefore your credit card processing account has been terminated effective 03/26/2015. Your breach consists of the following:

Reason for Closure: Excessive Chargebacks

We may be holding a security reserve account in accordance with your merchant agreement with us. This account has been established for the purpose of assuring payment of any pending or potential chargebacks, fees, or fines in the event that you are unable to pay them through your operating revenues. These funds will be held following the account closure in order to allow for chargeback processing if we need to access them.

You continue to be responsible for promptly providing any and all documentation requested by Humboldt Merchant Services. In order to prevent unnecessary charges to your account, we must receive requested information, documents, sales drafts, and invoices within five days. Please be aware that if your equipment is under lease, that lease is a separate and binding contract with the leaseholder. Please contact the lessor at the address on your lease contract if you have any questions regarding your leased equipment.

Visa, MasterCard, and Discover guidelines allow 60 to 180 days to resolve all chargeback issues. For this reason, security reserve funds may be held for 180 days from the last activity on the account. Please feel free to call 60 days from the account closure date to request an update of the account status. Our Risk Department can be reached at (877) 387-5642 to assist with any questions.

Sincerely,

Risk Management
Humboldt Merchant Services

Now Sale

Megan Goodman

From: GMA Risk <risk@gmapay.com>
Sent: Thursday, November 6, 2014 4:08 PM
To: brian@bellaathomerresults.com
Cc: Customer Support
Subject: DBA: BHR*BELLAATHOMERESULTS Mid: [REDACTED]
Attachments: Merchant QA CB issues.docx

Hello,

This notice is to inform you that your GMA processing account has excessive chargeback levels. Your current chargeback ratio is over 6%. Your account is placed on GMA Risk Monitoring program and we will allow you **30 days** to bring account to acceptable chargeback levels. Failure to do so will result in account suspension, increased fees and possible termination.

Immediate actions:

- Account placed on GMA Risk Monitoring Program
- Account placed on 15% reserve as of 11/06/2014
- Suspended funds collected from 10/29 – 11/06 will remain suspended until the months end review. Suspended balance is \$7,320.02

Please provide us with chargeback reduction plan, so we can understand how the business is run and you plan to reduce dispute activity going forward. Please complete the form in its entirety. Please take any and all appropriate steps to minimize chargeback activity on your account and bring the ratios to the appropriate levels to avoid interruption in services and / or possible termination.

Thank you,

Risk Department

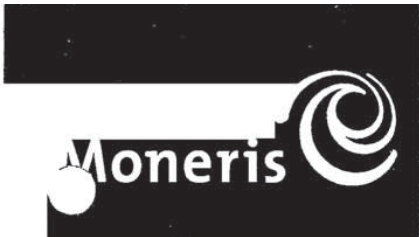
Tel: 310.220.0624
Fax: 310.602.6282
11835 W. Olympic Blvd., Suite 650E
Los Angeles, CA 90064
www.gmapay.com



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October 9, 2015

Newport Crossing

Dental Pro Results
3815 River Crossing Pk
Indianapolis, IN
48240

Merchant Number: [REDACTED]

Dear Merchant,

This letter is to advise you of the immediate termination of your Merchant Agreement.

Please contact Merchant Security at 1-800-471-9511 to arrange for the return of any Moneris property which maybe in your possession so as to avoid future billings.

Thank you for your prompt attention to this matter.

Regards,

A handwritten signature in black ink, appearing to read "R. B. A.", written in a cursive style.

Rick B.
Risk Analyst
Moneris Solutions
Tel: 877-252-6122
Fax: 877-377-7300

www.moneris.com



January 19, 2015

Mint House LLC
9233 Park Meadows Drive
Lone Tree, CO 80124

MID: [REDACTED]
DBA: Ivory Pro

Dear Danielle Foss:

This letter is to notify you that your merchant account with Meritus Payment Solutions will be terminated on **January 30, 2015** for one or more of the reasons listed below:

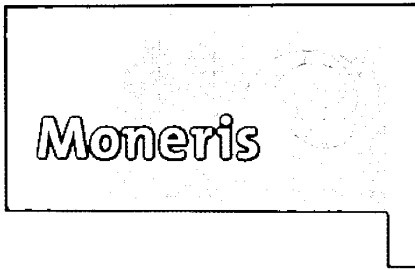
- ☐ Excessive chargebacks and/or retrievals
- ☐ Excessive authorizations and/or fraudulent transactions
- ☐ The nature of your business poses a security risk
- ☐ Receipt of unsatisfactory data from other sources (credit reporting agencies, MATCH, etc.)
- ☐ Substantial change in your financial condition
- ☐ Collections
- ☐ Misrepresentation of information related to your application or the services/products offered
- ☐ Substantial change in the form, management, operations, or ownership of your business
- ☐ Violation of Card Association Rules

In order to avoid possible rejects, please make sure that your last batch is batched out before 12:00pm PST on January 29, 2015.

Because of the nature of this termination, all funds, deposits, securities, pledges, and reserves held by or assigned to us or our acquiring bank will remain withheld for a period of at least 180 days after the last chargeback or date of termination, whichever is greater, to prevent any potential losses incurred by us or our acquiring bank. All chargebacks will first be charged to the merchant's bank account. If that bank account does not contain sufficient funds to cover the chargebacks, we may withdraw funds from any of the accounts held by us to cover the chargebacks (as well as any related fees and fines). We regret having to take this position, but we hope to make this transition as easy as possible. If you have any questions regarding this letter, please contact the Risk Department.

Sincerely,

Risk Department
Meritus Payment Solutions
2600 Michelson Drive, Suite 1600
Irvine, CA 92612
Phone: (888) 851-7558
Fax: (949) 861-9240
risk@merituspayment.com



How + why

December 11, 2015

FIRST CLASS WHITE DIRECT
2850 W HORIZON RIDGE P
HENDERSON, NV
89052

Merchant Number: [REDACTED]

Dear Merchant,

This letter is to advise you of the immediate termination of your Merchant Agreement.

Please contact Merchant Security at 1-800-471-9511 to arrange for the return of any Moneris property which maybe in your possession so as to avoid future billings.

Thank you for your prompt attention to this matter.

Regards,

A handwritten signature in black ink, appearing to read "Lawrence P.", is written over a horizontal line.

Lawrence P.
Fraud Analyst
Moneris
Tel: 877-252-6122
Fax: 877-377-7300

www.moneris.com